

# EXHIBIT F

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*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF ARIZONA**

John J. Hurry, et al.,

*Plaintiffs,*

v.

Financial Industry Regulatory Authority  
 Incorporated, et al.,

*Defendants.*

Case No. 2:14-cv-02490-PHX-ROS

**MOTION FOR LEAVE TO  
 WITHDRAW**

Assigned to the Honorable Roslyn O. Silver

Pursuant to LRCiv 83.3(b)(2) and Ariz.R.S.Ct. 42, Rule of Professional Conduct (“ER”) 1.16(a)(1), the law firm of Mandel Young, plc (“MY”) and undersigned counsel (collectively, “Movants”) hereby move the Court for an order permitting MY and all of its attorney personnel to withdraw as counsel of record in this action both for all remaining plaintiffs (collectively, the “Current Plaintiffs”)<sup>1</sup> and for all former plaintiffs that, despite the dismissal of their claims, will have the right to file a notice of appeal at the appropriate time from any judgments, orders, decrees, and rulings in this action (collectively, the “Former Plaintiffs”).<sup>2</sup>

<sup>1</sup> The Current Plaintiffs are: John J. Hurry; Justine Hurry; BRICFM, LLC; FLJH, LLC; Hurry Family Revocable Trust; Investment Services Capital, LLC; Investment Services Corporation; Investment Services Holdings Corp.; SCAINTL LLC; SCAP 4, LLC; SCAP 5, LLC; SCAP 6, LLC; SCAP 7, LLC; SCAP 9, LLC; SCAP III, LLC; and Scottsdale Capital Advisors Partners, LLC.

<sup>2</sup> The Former Plaintiffs are: Investment Services Partners, LLC; SCAP 1, LLC; SCAP II, LLC; SCAP 8, LLC; SCAP 10, LLC; CJ3, LLC; Association of Securities Dealers, LLC; NEWCONMGT, LLC; ISC, LLC; ISHC, LLC; NEWMGT, LLC; ASD Holding Company, LLC; and Hurry Foundation.

Movants respectfully submit that, under ER 1.16(a)(1), MY and its attorney personnel are ethically required to terminate their representation of all Current Plaintiffs and Former Plaintiffs (collectively, “Plaintiffs”) and to withdraw from the action as Plaintiffs’ counsel of record because continued representation of the Plaintiffs would violate the Rules of Professional Conduct. This determination has been reached in consultation with attorney Lynda C. Shely, MY’s outside ethics counsel. Movants are ethically prohibited from disclosing anything further per Movants’ obligations under ER 1.6(a).

The action remains in the discovery stage and has not been set for trial. Plaintiffs have been notified in writing of the status of the case, including the dates and times of any court hearings, pending compliance with any existing court orders, and the possibility of sanctions. Plaintiffs John and Justine Hurry’s names, last known residence, and last known telephone number are as follows: 1466 Pittman Terrace, Glenbrook, NV 89413, (480) 717-5044 (Tel.). The Plaintiff entities’ last known addresses and telephone numbers are as follows:

|   |  |
|---|--|
| Investment Services Corporation           | 7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044  |
| Hurry Family Revocable Trust              | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| Scottsdale Capital Advisors Partners, LLC | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| SCAP III, LLC                             | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| SCAP 4, LLC                               | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| SCAP 5, LLC                               | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253                   |

|                                    |  |
|------------------------------------|--|
|                                    | (480) 717-5044   |
| SCAP 6, LLC                        | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| SCAP 7, LLC                        | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| SCAP 9, LLC                        | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| BRICFM, LLC                        | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| Investment Services Capital, LLC   | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| Investment Services Holdings Corp. | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| SCAINTL, LLC                       | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| FLJH, LLC                          | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| Investment Services Partners, LLC  | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| SCAP I, LLC                        | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |

|    |  |  |
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| 1  | SCAP II, LLC                           | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| 2  |  |  |
| 3  | SCAP 8, LLC                            | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| 4  |  |  |
| 5  | SCAP 10, LLC                           | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
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| 7  | CJ3, LLC                               | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| 8  |  |  |
| 9  | Association of Securities Dealers, LLC | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| 10 |  |  |
| 11 | NEWCONMGT, LLC                         | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
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| 13 | ISC, LLC                               | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
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| 15 | ISHC, LLC                              | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| 16 |  |  |
| 17 | NEWMGT, LLC                            | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
| 18 |  |  |
| 19 | ASD Holding Company, LLC               | c/o Investment Services Corporation<br>7170 E. McDonald Drive, Ste. #4<br>Scottsdale, AZ 85253<br>(480) 717-5044 |
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Hurry Foundation

c/o Investment Services Corporation  
7170 E. McDonald Drive, Ste. #4  
Scottsdale, AZ 85253  
(480) 717-5044

For all the foregoing reasons, an order granting MY and all of its attorney personnel leave to withdraw as counsel of record for all Plaintiffs is necessary and warranted. An LRCiv 83.3(b)(2)-compliant Certificate of Counsel accompanies this Motion, together with a Proposed Form of Order for this Court's consideration.

RESPECTFULLY SUBMITTED this 29th day of August, 2016.

**MANDEL YOUNG PLC**

By: /s/ Taylor C. Young  
Robert A. Mandel  
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Phoenix, Arizona 85016

**CERTIFICATE OF SERVICE**

The undersigned certifies that the original of the foregoing was transmitted this 29th day of August, 2016 to the Office of the Clerk of the U.S. District Court using the CM/ECF System, which will send notification of such filing and transmittal of a Notice of Electronic Filing to all CM/ECF registrants for this case.

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/s/ Taylor C. Young  
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